

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: DARRYL JEFFREY THOMAS and KESIA MARIA THOMAS, Debtors, CONSUMER PORTFOLIO SERVICES, INC. Movant, v. DARRYL JEFFREY THOMAS, KESIA MARIA THOMAS, and WILLIAM C. MILLER, Chapter 13 Trustee. Respondents.	Bankruptcy No. 18-10837-amc Chapter 13 Related to Doc. No. 22
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SIX-MONTH STIPULATION
RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Consumer Portfolio Services, Inc., by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtors, Darryl Jeffrey Thomas and Kesia Maria Thomas, by and through their undersigned counsel, Robert H. Holber, Esquire, and together file this Six-Month Stipulation Resolving Motion for Relief from the Automatic Stay (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. Movant has a secured interest in Debtors' 2012 Dodge Truck Grand Caravan Extended Passenger Van SXT 3.6L V6 VIN 2C4RDGCG5CR323838 (the "Vehicle").
3. As of the date of this Stipulation, the Debtors are in default of their post-petition payment obligations to Movant in the amount of \$1,941.00, plus \$350.00 in legal fees and \$181.00 in costs for total of \$2,472.00.
4. In addition to monthly payment to the Chapter 13 Trustee, the Debtors will cure the post-petition arrears by making monthly payments directly to Movant, outside of the plan, in the amount of

\$412.00 until the post-petition arrears are cured. The first payment due under this Stipulation will be the payment that comes due on June 28, 2018. The payments and due dates will be as follows:

June 28, 2018	\$412.00
July 28, 2018	\$412.00
August 28, 2018	\$412.00
September 28, 2018	\$412.00
October 28, 2018	\$412.00
November 28, 2018	\$412.00

5. Debtors shall direct the payments to:

CPS AUTO REC TRUST 2016 - B
P O BOX 98768
PHOENIX, AZ 85038 - 0768

6. Debtors have proposed to cure the prepetition arrears through their Chapter 13 Plan. They have also proposed to continue to make regular monthly payments of \$486.45, per the Contract, to the Movant. Upon confirmation of the Debtors Chapter 13 Plan, Debtors will make these payments through their Plan while concurrently abiding by the terms and conditions outlined in this Stipulation.

7. Payments must be received by Movant at the above-referenced address on or before the 28th day of each month. Debtors will be in default under the Order in the event that Debtors fail to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtors default one time under this Order, Movant may serve a notice of default and intent to file Certification of Default but Debtors will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

8. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtors shall cure the prepetition and post-petition arrears within ten (10) days from the date of such conversion. Should Debtors fail to cure said arrears within the ten day period, such failure shall be deemed a default under the terms of this Stipulation. Movant may serve a notice of default and intent to file Certification of Default but Debtors will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

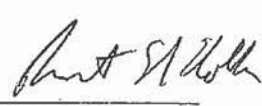
9. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: 
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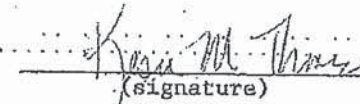
Dated: June 19, 2018

By: 
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*Counsel for Darryl Jeffrey Thomas and
Kesia Maria Thomas*


(signature)

Darryl Jeffrey Thomas


(signature)

Kesia Maria Thomas

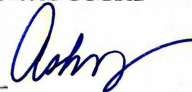
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ORDER OF COURT

AND NOW, this 2nd day of July, 2018, upon consideration of the foregoing Six-Month Stipulation Resolving Motion for Relief from the Automatic Stay, it is hereby ORDERED that the Stipulation is approved.

BY THE COURT



Hon. Ashely M. Chan
U.S. Bankruptcy Court Judge